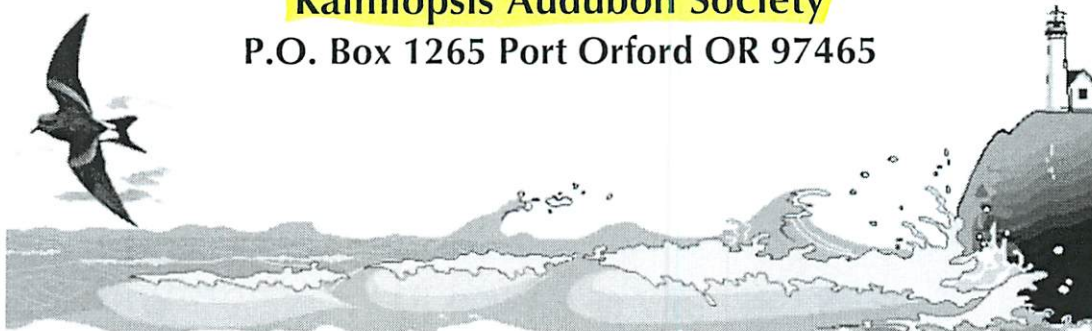


Kalmiopsis Audubon Society
P.O. Box 1265 Port Orford OR 97465



July 7, 2014

Sondra Ruckwardt. Army Corps of Engineers, Portland District
P.O. Box 2946
Portland, OR 97208-2946

Re: DEIS, Double-crested cormorant plan to reduce predation of juvenile salmonids

Greetings:

I am writing on behalf of the Kalmiopsis Audubon Society. Our group has more than 200 members who are concerned about birds, fish and wildlife. For that reason, we strongly oppose your proposal to lethally control such a large number of Double-crested cormorants on East Sand Island (CENWP-PM-E-14-08). Killing cormorants should not be an acceptable routine action to make up for human mismanagement of imperiled fish and their habitats.

It's important to recognize that West Coast Double-crested Cormorant populations are already estimated to be an order of magnitude lower than they were historically. Aside from at East Sand Island, populations are actually declining.

In addition, we are especially concerned that the birds you intend to target nest in the midst of other breeding seabirds birds, including Brandt's cormorants, Caspian terns, and California brown pelicans. Brown pelicans were only recently removed from the Endangered Species list, but now they are once again facing very big problems owing to unprecedented nest failures at most of their other breeding colonies. Your Draft EIS is inadequate because it does not adequately explain how federal marksmen will shoot the double crested cormorants during breeding season without disturbing the other breeding birds that nest on the island, including the now struggling brown pelicans.

The DEIS is also inadequate because it does not address compensatory mortality, the role of hatchery fish in "setting a table," and the wildly fluctuating salmon returns. It does not provide adequate research on non-lethal alternatives to dispersing cormorants.

We urge the Corps to recognize the manmade causes of salmon decline, including dams, habitat loss and fish hatcheries –and to focus recovery efforts on addressing these problems rather than to try to pin the blame onto the back of cormorants.

Sincerely,

/s/ Ann Vileisis
President